

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426
April 19, 2021

OFFICE OF ENERGY PROJECTS

Project No. 1889-085 – Massachusetts/New
Hampshire/Vermont
Turners Falls Hydroelectric Project
FirstLight MA Hydro LLC

VIA FERC Service

Mr. Nick Hollister
Senior Operations Manager
FirstLight Power Services LLC
99 Millers Falls Rd.
Northfield, MA 01360

Reference: Additional Information Request

Dear Mr. Hollister:

On January 14, 2021, Commission staff requested that FirstLight MA Hydro LLC (FirstLight), the licensee for the Turners Falls Hydroelectric Project No. 1889, provide additional information and resolve deficiencies for the license application that it filed on April 29, 2016, and amended on December 4, 2020. On March 15, 2021, FirstLight filed a response to Commission staff's January 14, 2021 letter.¹

We have reviewed the March 15, 2021 filing, and request additional information in Schedule A. Please provide this information within 60 days from the date of this letter, pursuant to section 5.21 of the Commission's regulations.² If the requested information causes another part of the application to be inaccurate, that part must be revised and

¹ FirstLight's March 15, 2021 filing did not include responses to items 4, 5, 13, and 14 of Schedule B of Commission staff's January 14, 2021 letter. On March 25, 2021, FirstLight stated that it needed an additional 90 days to file this information.

² FirstLight's filing should include responses to items 4, 5, 13, and 14 of Schedule B of Commission staff's January 14, 2021 letter. To the extent FirstLight is unable to provide responses to these outstanding items within 60 days of the date of this letter, FirstLight should provide a progress report on its analysis and the date by which it will file the information.

refiled by the due date. Please be aware that further requests for additional information may be sent to FirstLight at any time before final action on the license application.

The Commission strongly encourages electronic filing. Please file the requested information using the Commission's eFiling system at <https://ferconline.ferc.gov/eFiling.aspx>. For assistance, please contact FERC Online Support at FERCOnlinesupport@ferc.gov; call toll-free at (866) 208-3676; or, for TTY, contact (202) 502-8659. In lieu of electronic filing, FirstLight may submit a paper copy. Submissions sent via the U.S. Postal Service must be addressed to: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 888 First Street NE, Room 1A, Washington, D.C. 20426. Submissions sent via any other carrier must be addressed to: Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission, 12225 Wilkins Avenue, Rockville, MD 20852. The first page of any filing should include docket number P-1889-085.

If FirstLight has any questions concerning this letter, please contact Steve Kartalia at (202) 502-6131, or via email at stephen.kartalia@ferc.gov.

Sincerely,

Nicholas Tackett, Chief
New England Branch
Division of Hydropower Licensing

Enclosure: Schedule A — Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION

Cultural Resources

1. The updated table of archaeological sites that was provided in FirstLight's March 15, 2021 response to item 15 of Schedule B of Commission staff's January 14, 2021 letter, indicates that there are 123 archaeological sites³ located within the Turners Falls Area of Potential Effects (APE). The 123 sites identified in the updated table differs from the 109 sites identified at the project in FirstLight's proposed Historic Properties Management Plan (HPMP). The table filed on March 15, 2021, includes an additional 14 sites, including one site in the vicinity of Erving, Massachusetts (site 19FR051); eight sites in the vicinity of Gill, Massachusetts (sites 19FR266, 19FR269, 19FR309, 19FR310, 19FR348, 19FR429, 19FR430, 19FR431); one site in the vicinity of Greenfield (site 19FR012); one site in the vicinity of Montague (site 19FR353); and three sites in the vicinity of Northfield (sites 19FR001, 19FR120, 19FR344). All 14 of these sites are identified in the Phase IA archaeological reconnaissance report for the project filed with the Commission on May 15, 2015. However, they are not identified in the proposed HPMP. Please clarify why these sites are not included in the proposed HPMP and identify any potential adverse effects of the proposed project on these 14 sites.

2. Site 19FR009 (the King Phillips Hill site) is identified as within the project APE in the Phase IA archaeological reconnaissance report and is included in Table 3.1-1 of the proposed HPMP. However, this site is not included in the updated table provided in FirstLight's March 15, 2021 response to item 15 of Schedule B of Commission staff's January 14, 2021 letter. Please clarify why this site, which is listed on the National Register of Historic Places, was excluded from the March 15, 2021 table.

Project Boundary

3. Item 20 of Schedule B of Commission staff's January 14, 2021 letter, requested additional information on lands that were identified in Exhibit G as lands "to be acquired," including an explanation of what the acquisition will entail (e.g., fee ownership, land rights, flowage rights) and how the lands will be used for project purposes. In its March 15, 2021 response, FirstLight only provided information about lands that it is proposing to add to the current project boundary. However, the Exhibit G maps identify several additional parcels of land within the current project boundary as lands "to be acquired." The following table lists the sheets in Exhibit G on which this occurs:

³ While the updated table identifies 125 sites at the project, two of these sites (sites 19FR110, 19FR312) have been listed twice.

Schedule A

| Sheet # | Description |
|---------|-------------------------------------|
| 1 | No issues |
| 2 | No issues |
| 3 | No issues |
| 4 | Parcel(s) along Millers River |
| 5 | Parcel(s) on both sides of CT River |
| 6 | Parcel(s) on both sides of CT River |
| 7 | Parcel(s) on west side of CT River |
| 8 | Parcel(s) on both sides of CT River |
| 9 | Parcel(s) on west side of CT River |
| 10 | Parcel(s) on west side of CT River |
| 11 | Parcel(s) on both sides of CT River |
| 12 | Parcel(s) on both sides of CT River |
| 13 | Parcel(s) on both sides of CT River |

If any of these lands have been acquired, the Exhibit G maps should be revised to reflect the current status of the lands. If these lands have not been acquired, please provide an explanation of what the acquisition would entail (e.g., fee ownership, land rights, flowage rights) and how the lands are, or would be, used for project purposes.